



JENNIFER M. GRANHOLM  
GOVERNOR

STATE OF MICHIGAN

DEPARTMENT OF NATURAL RESOURCES

LANSING



REBECCA A. HUMPHRIES  
DIRECTOR

July 31, 2007

Dear Stakeholder:

**SUBJECT: Opportunity to Comment on Department of Natural Resources Application for Pesticide Derogation (Temporary Exemption) to the Forest Stewardship Council International**

The 3.9 million acre Michigan State Forest System is certified by two forest certification systems, the Sustainable Forestry Initiative (SFI) and the Forest Stewardship Council (FSC). The FSC closely scrutinizes the use of pesticide products on certified land, and maintains a list of chemicals that are prohibited from use unless special temporary permission is requested from, and granted by the FSC (this is referred to as "derogation") to use them.

The Department of Natural Resources (DNR) is requesting derogation to utilize five pesticides currently on the FSC list. Consistent with FSC policy requirements, we are seeking comments from interested parties on our request for pesticide derogation.

The formal derogation requests, which include detailed information about proposed use of the chemical, are posted on the DNR Forest Certification web site at: [http://www.michigan.gov/dnr/0,1607,7-153-30301\\_33360---,00.html](http://www.michigan.gov/dnr/0,1607,7-153-30301_33360---,00.html). The following five chemicals are in our derogation request to the FSC:

1. Hexazinone (Velpar) - one of the most widely used forestry herbicides in the United States. It has been in use for more than 30 years to control brush and weeds during the establishment of new stands of trees.
2. 2,4-D, 2-ethylhexyl ester - used for habitat restoration and control of invasive exotic plants. It provides a management tool for some difficult to control species.
3. 2-(2,4-DP), dma salt (= dichlorprop, dma salt) - used for habitat restoration and control of invasive exotic plants. It provides a management tool for some difficult to control species.
4. Dicamba, dma salt - used for habitat restoration and control of invasive exotic plants. It provides a management tool for some difficult to control species.

NATURAL RESOURCES COMMISSION

Keith J. Charters, Chair • Mary Brown • Hurley J. Coleman, Jr. • Darnell Earley • John Madigan • J. R. Richardson • Frank Wheatlake

STEVENS T. MASON BUILDING • P.O. BOX 30028 • LANSING, MICHIGAN 48909-7528  
[www.michigan.gov/dnr](http://www.michigan.gov/dnr) • (517) 373-2329

*Great Lakes, Great Times, Great Outdoors!*

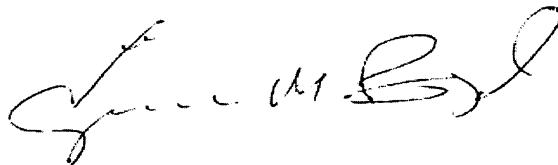
July 31, 2007

5. Diflybenzuron (Dimlin) – used on a limited scale to protect young red pine plantings from Red-headed pine sawfly.

**All five of these pesticides have been approved for use by the Environmental Protection Agency**, and if used, would be applied according to label guidelines and only by licensed applicators. The use of these chemicals will be minimized, applied on a limited number of acres, and only used when necessary as part of an integrated pest management program to achieve defined management objectives. When use of chemical pesticides is necessary, we select the least toxic, least environmentally persistent, narrowest spectrum products that provide cost effective control and are labeled for the target species.

The DNR invites your comments on use of these pesticides. Please submit your comments by September 16, 2007, to Dennis Nezich, Forest Certification Specialist, Marquette Operations Service Center, 1990 US 41 South, Marquette, MI 49855, or by email at [nezichd@michigan.gov](mailto:nezichd@michigan.gov). We will compile all comments, include them in the derogation requests, and forward them to the FSC. If you have questions, please feel free to contact Mr. Nezich at 906-228-5245.

Sincerely,

A handwritten signature in black ink, appearing to read "Lynne M. Boyd", with a stylized flourish at the end.

Lynne M. Boyd, Chief  
Forest, Mineral and Fire Management  
517-373-1246